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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
445 Twelfth Street, S. W. – Room TWB-204
Washington, D. C. 20554

Re: Ex parte, CC Docket No. 96-98, Implementation of the Local Competition
Provisions of the Telecommunications Act of 1996

Dear Ms. Roman Salas:

On Thursday, June 24, 1999, Rian Wren, Russell Morgan, Mark Witcher, Nancy Dalton, David Kettell, Roy Hoffinger and the undersigned, of AT&T, met with Carol Matthey, Jake Jennings, Audrey Wright, William Agee, Jessica Rosenworcel and John Stanley of the Common Carrier Bureau's Policy and Program Planning Division. The meeting was held at AT&T's office in Dallas, Texas in order to facilitate the Commission staff's participation in an on-site program regarding AT&T's operations support systems. The Commission staff participated in an overview of AT&T's OSS design and development efforts to date and a demonstration of various OSS interfaces.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206 (b) of the Commission's rules.

Sincerely,

ATTACHMENT

cc: C. Matthey John Stanley
 J. Jennings Jessica Rosenworcel
 A. Wright
 W. Agee

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AT&T Market Entry and Testing Status

June 24, 1999



Agenda

- AT&T UNE-P Market Entry Plans
 - Commercial Entry
 - Resale Customer Base Migration to UNE-P
- AT&T Local Factory Demonstration
- AT&T/SWBT Testing Results
 - Pre-Ordering
 - Ordering/Provisioning
 - Repair/Maintenance
 - Usage Transfer and Billing
- AT&T Resale to UNE-P Migration Status
- TX OSS Testing
- Change Control Process



AT&T UNE-P Market Entry Plans



AT&T UNE-P Market Entry Plans

Commercial Entry

- Service Readiness Testing (SRT) was completed on 6/14/99
 - SRT tests functionality and performance
 - 132 orders were executed and 46 repair/maintenance scenarios completed
 - Additional scenarios will be executed as new software is deployed within AT&T
- Market Readiness Testing (MRT) began on 6/15/99
 - Market readiness testing expands testing parameters to include Outbound and Inbound sales processes as well as Marketing processes (e.g., direct mail)
 - 1900 employees and 3600 commercial “friendly users” are targeted for testing purposes
- Commercial entry beyond MRT is targeted for 7/15/99
 - Testing and commercial entry dates have been delayed due to SWBT 5/01 release problems (change control process problems)
 - Entry volumes will be dependent on SWBT’s demonstration of its ability to process commercial volumes



AT&T UNE-P Market Entry Plans

Resale to UNE-P Migration

- Approximately 64,000 resale customers to be converted to UNE-P
- 90 customers are currently in the conversion process
 - 30 orders issued to SWBT to date
 - 2 orders rejected for valid reasons
 - 2 orders should have rejected due to Call Forwarding # format issues but did not which resulted in loss of voice mail capabilities
 - 28 orders that completed resulted in loss of outbound dialing capabilities
 - 60 orders are currently being generated to SWBT
- First Volume Wave is scheduled to be processed and validated in early July
- If volume is processed successfully, conversion of all resale customers to UNE is scheduled to be completed by end of August
- Commercial entry volumes will be constrained until conversion is completed and any volume processing issues resolved



AT&T/SWBT Testing Results



AT&T SRT and Resale to UNE Migration Statistics

- Pre-order Transactions approximately 64,000
- Orders Executed 162
 - New 16
 - Migration (SWBT Retail to AT&T UNE) 72
 - Change orders 44
 - Resale to UNE Migration 30
- Repair/Maintenance Scenarios - SRT 46



Pre-Ordering Results

■ Service Readiness Testing

- Incorrect SWBT pre-order data will cause orders to reject and customer due dates to be jeopardized
 - Incorrect CLLI codes were provided which caused orders to reject
 - Addresses validated through pre-order and mechanically placed on the order were invalid
 - Customer orders cannot be processed when TNs are not available (TNs not available for an Austin Switch for more than 24 hours)

■ Resale to UNE Migration

- 24.4% (15,606 customers) of the existing AT&T customer base required manual investigation to validate pre-order information
 - TNs not available
 - addresses not available for validation via datagate
- Pre-processing efforts such as these will not be available in a commercial environment



Ordering/Provisioning Results

■ Service Readiness Testing (132 Orders)

- Change orders will be rejected by SWBT if FOC/SOC information SWBT provided is used
 - 11% FOCs/SOCs contained invalid ECCKTs due to the 5/01 release
 - missing ECCKTs
 - invalid delimiters
 - incomplete ECCKTs (truncated)
 - 9% FOCs/SOCs contained invalid Reference numbers
 - missing REFNUM completely
 - REFNUMs assigned to incorrect ECCKTs
 - Manual processing was required to update AT&T's systems with accurate data
 - In a commercial environment FOCs/SOCs will not be manually analyzed to determine if data provided by SWBT is accurate



Ordering/Provisioning Results

- Order Management must be performed manually to confirm customer due dates and order completion status
 - 8% orders did not receive FOCs/SOCs (FTP receipt problem - no concurrent SWBT processing)
 - 2% of orders did not receive acknowledgements "997s"
 - 10% of return responses were received manually via fax
 - SWBT represented that all responses will be sent electronically if the order is generated electronically
 - Supplemental orders do not flow through any longer
 - Reject rate for LEX was 23.6% and for EDI was 51.8% during May
 - 85 of 164 EDI orders for May rejected; 63 of 279 for April rejected;
 - 12-month average reject rate for LEX is 22.1% and 32.9% for EDI
 - Rejects and secondary FOCs are received post-FOC
- SWBT left SWBT "leave behind" door hanger; not generic CLEC door hanger
- SWBT technician attempted to winback an AT&T customer during an AT&T installation appointment



Repair/Maintenance Results

- Service Readiness Testing: 46 scenarios
 - AT&T UNE accounts cannot be accessed upon order completion for MLT or trouble ticketing
 - AT&T User Ids were deleted by SWBT resulting in no AT&T access for MLT and trouble ticketing
 - Several hours to restore



Date SOC Recvd - Date Attempted to Access SWBT Trouble Admin (1999)

TN	SOC Recvd	1st Toolbar Attempt	2nd Toolbar Attempt	E-Mail to Randy	E-Mail from Randy	3rd Toolbar Attempt	4th Toolbar Attempt	Days from SOC to account available for Repair and Maintenance
281-438-6XXX	4/26/99	UNA 04/30	UNA 05/04	5/6	05/07	UNA 05/07	Access 05/21	>11
214-495-7XXX	4/29/99	Access 05/11	na	na	na	na	na	
214-890-9XXX	4/28/99	UNA 04/30	UNA 05/11	5/11	5/13	UNA 05/13	Access 05/21	>15
972-889-1XXX	5/4/99	UNA 04/30	UNA 05/04	05/06	05/07	UNA 05/07	Access 05/21	>3
713-666-9XXX	5/4/99	UNA 04/30	UNA 05/04	05/06	05/07	UNA 05/07	Access 05/21	>3
915-683-2XXX	5/5/99	Access 05/11	na	na	na	na	na	
915-585-9XXX	5/4/99	Access 05/11	na	na	na	na	na	
713-647-7XXX	5/4/99	UNA 04/30	UNA 05/04	05/06	05/07	UNA 05/07	5/21	>3
281-997-7XXX	5/4/99	UNA 04/30	UNA 05/04	05/06	05/07	UNA 05/07	5/21	>3
972-267-2XXX	5/4/99	UNA 04/30	UNA 05/04	05/06	05/07	UNA 05/07	5/21	>3
972-279-9XXX	5/4/99	UNA 6/16	UNE 06/23					>50
915-584-7XXX	5/6/99	UNA 05/07	UNA 05/10	05/11	5/17	UNA 05/17	Access 05/21	>11
972-838-4XXX	5/6/99	UNA 05/07	UNA 05/10	05/11	05/13	UNA 05/13	Access 05/21	>7
817-498-7XXX	5/6/99	UNA 05/07	UNA 05/10	05/11	05/13	UNA 05/13	Access 05/21	>7
817-472-9XXX	5/7/99	UNA 05/07	UNA 05/10	05/11	05/13	UNA 05/13	Access 05/21	>6
214-363-8XXX	5/7/99	UNA 05/07	UNA 05/10	05/11	05/13	UNA 05/13	Access 05/21	>6
214-342-7XXX	5/10/99	UNA 5/14	na	05/11	05/13	UNA 05/13	Access 05/21	>3
915-856-3XXX	5/11/99	UNA 5/14	UNA 5/24	6/16	na	na	na	>12
281-260-8XXX	5/11/99	UNA 6/16						>36
214-361-0XXX	5/12/99	UNA 5/14	Access 5/24	na	na	na	na	>2
210-928-7XXX	5/13/99	UNA 5/14	Access 5/24	na	na	na	na	>1
817-861-2XXX	5/14/99	UNA 5/14	Access 5/24	na	na	na	na	
972-270-9XXX	5/14/99	UNA 5/14	Access 5/24	na	na	na	na	
512-352-2XXX	5/14/99	UNA 5/14	Access 5/24	na	na	na	na	
210-435-2XXX	5/14/99	UNA 5/14	Access 5/24	na	na	na	na	
972-396-9XXX	5/17/99	UNA 6/16						>30

UNA = Unauthorized to access this information. Message received from SWBT Trouble Admin System



Date SOC Recvd - Date Attempted to Access SWBT Trouble Admin (1999)

TN	SOC Recvd	1st Toolbar Attempt	2nd Toolbar Attempt	E-Mail to Randy	E-Mail from Randy	3rd Toolbar Attempt	4th Toolbar Attempt	Days from SOC to account available for Repair and Maintenance
210-682-3XXX	5/18/99	UNA 5/18		Access 6/16	na	na	na	
210-403-0XXX	5/18/99	UNA 5/18	Access 5/24	UNA 6/16				
956-795-1XXX	5/20/99	UNA 5/24	UNA 6/16					>4
214-495-7XXX	5/26/99	UNA 6/16						>21
214-495-9XXX	5/31/99	Access 6/16	na	na	na	na	na	>16
972-732-1XXX	6/1/99	Access 6/16	na	na	na	na	na	>15
281-292-3XXX	6/2/99	UNA 6/16						>14
817-427-4XXX	6/3/99	Access 6/16	na	na	na	na	na	
214-946-4XXX	6/3/99	Access 6/16	na	na	na	na	na	
972-712-8XXX	6/3/99	Access 6/16	na	na	na	na	na	
972-735-9XXX	6/4/99	Access 6/16	na	na	na	na	na	
972-991-9XXX	6/9/99	Access 6/16	na	na	na	na	na	
210-337-1XXX	6/10/99	UNA 6/16						>6
972-547-0XXX	6/10/99	Access 6/16	na	na	na	na	na	
281-292-3XXX	6/10/99	UNA 6/16						>6
281-256-1XXX	6/10/99	UNA 6/16						>6
817-238-0XXX	6/10/99	Access 6/16	na	na	na	na	na	
972-540-2XXX	6/11/99	Access 6/16	na	na	na	na	na	
972-329-2XXX	6/11/99	UNA 6/16						>5

UNA = Unauthorized to access this information. Message received from SWBT Trouble Admin System



Usage Transfer and Wholesale Billing Results

- AT&T end-user billing and wholesale billing will be incorrect as a result of SWBT recording and record generation problems
 - 4.3% of the usage records are problematic
 - Local records are being generated when toll records should be
 - EAS records are not being provided accurately
 - terminating records are missing

- SWBT Wholesale Bills are currently being analyzed



AT&T Resale to UNE-P Migration Status



AT&T Resale to UNE-P Migration Status

- 30 orders issued to date
 - 2 rejected for valid reasons
 - 2 should have rejected for invalid call forwarding number but did not
 - Voice Mail inactivated as a result
 - 27 customers have lost their ability to place outbound calls
 - 1 customer lost dial tone all together when repair and maintenance trouble acted upon by SWBT
 - 1 customer not affected at all

- SWBT Trouble Reports demonstrate the following causes
 - no trouble found
 - pair re-assignment
 - translation problems



Texas OSS Testing



Texas PUC OSS Testing

- AT&T understood the PUC to order “Third Party Testing” mirroring the experiences of a new CLEC
- AT&T and MCI offered EDI gateways to save time fully expecting that SWBT requirements and change control processes would be evaluated
- Testing has turned into limited carrier to carrier testing
- To date, test plan processes have not been adhered to
- Testing is deficient and as a result will not demonstrate commercial readiness



Texas OSS Testing Deficiencies

- The TX OSS Test as designed will not demonstrate whether or not SWBT's OSSs are capable to support commercial entry.
 - Capacity test was limited to 2 days and does not include provisioning, billing, usage transfer and compensation processes.
 - An additional day for retesting performed due to lost order experiences.
 - Capacity test includes groomed orders that have been replicated and are orders that are known to be able to "flow through."
 - Functionality test which includes provisioning and billing is limited to 506 orders
 - Additional orders will be retested to validate fixes implemented by SWBT
 - Analysis of SWBT requirements documentation and change control processes are excluded from the test.



Texas OSS Testing Deficiencies

- Test execution does not replicate the “real world” as a CLEC
 - There is limited blindness involved in the test.
 - Telcordia is not building a CLEC environment using SWBT documentation and requirements; the EDI gateways built by AT&T and MCI are being used for the test.
- Issues experienced in AT&T SRT are not experienced in the OSS testing despite the fact that both use SWBT’s production environment, e.g.:
 - Resale to UNE-P Migration service outage problems AT&T customers experienced were not experienced in PUC Test.
 - AT&T Resale to UNE-P Migrations received SOC’s before orders were completed; not demonstrated during TX OSS testing.



Texas OSS Testing: Issues of Coverage and Scope

- Areas not covered or not covered adequately (Contrasted with BA-NY Testing)
 - Account management and Help Desk support and CLEC training
 - Quality of EDI documentation
 - Methods and Procedures and technical support for ordering/provisioning Complex Services
 - Change control policies and practices
 - Coordinated Pre-Order and order functionality
 - End-to-end functionality testing at anticipated commercial usage
 - LIDB
 - Collocation request processing and provisioning
 - Concurrent review of historical and current CLEC orders
- Additional Process Issues
 - Lack reports and process management tools
 - Absence of minutes/no technical workshops/closed participation
 - Undefined testing philosophy (diagnostic vs. military)
 - Test plan development



Preliminary SWBT OSS Deficiencies Found in PUC OSS Testing

■ Pre-Order

- Telephone numbers assigned that are already working telephone numbers.
- TNs not available.
- Invalid CLLI codes provided.
- Address validation does not guarantee that the address will pass the ordering process.
- Response time degradation as users increased.

■ Ordering and Provisioning

- Installation problems were experienced by numerous participants (static, loss of dial tone).
- Incomplete SWBT business rules for caption listings and hunting.
- Addresses and CLLI codes validated via pre-order are rejected.
- Orders are lost; AT&T orders are not acknowledged or confirmed (more than 2600 orders over 2 days, approximately 18% of the orders sent).
- FOCs and SOC's in many instances are returned via fax not EDI.
- Information in the FOCs and SOC's was inaccurate (e.g., ECCKTs after 5/01 SWBT Release).

■ Repair and Maintenance

- SWBT back-office posting delays cause AT&T accounts to not be available for access upon order completion.

■ Usage Transfer and Wholesale Billing

- TX OSS usage and billing validation is in progress



OSS Interface Summary



AT&T/SWBT OSS Interface Summary

OSS Capability	AT&T/SWBT Interface	Problem Areas
Pre-Ordering	Datagate (SWBT proprietary interface)	<ul style="list-style-type: none"> ▪ Inaccurate address validation data ▪ Invalid CLLI codes ▪ TNs not available for up to 24 hours ▪ Response times appear to be slow
Ordering	EDI	<ul style="list-style-type: none"> ▪ Supplemental orders do not flow through ▪ FTP issues – lost orders ▪ Manual response transactions (FOCs, SOC's and rejects) ▪ Post-FOC rejects and secondary FOCs ▪ Receipt of SOC's prior to service completion ▪ Invalid EDI field content due to 5/01 SWBT release problems
Provisioning	EDI Flow Through	<ul style="list-style-type: none"> ✓ ▪ Nearly 100% of Resale to UNE Migration customers not able to place calls ▪ Installers contacting AT&T customers directly ✓ ▪ Installer trying to winback customer during AT&T installation appointment ▪ SWBT installers trying to perform inside wire work during OSS test
Repair/Maintenance	Toolbar (SWBT proprietary interface)	<ul style="list-style-type: none"> ▪ AT&T accounts not available for MLT for as long as 43 days following order completion ✓ ▪ AT&T user IDs deleted by SWBT ▪ AT&T customers contacted directly by SWBT technicians ✓ ▪ SWBT "leave behind" material left at customer premise; not generic CLEC material ✓ ▪ SWBT reported "no trouble found" but service somehow restored ✓ ▪ Customer's service has been restored without ever receiving a trouble ticket or referral from AT&T
Usage Transfer	Connect:Direct <ul style="list-style-type: none"> ▪ EMR Format ▪ 9299 Compensation records 	<ul style="list-style-type: none"> ✓ ▪ Missing terminating records ✓ ▪ Incorrect records received ✓ ▪ Local records received for toll calls (no EAS involved)
Wholesale Billing	CABS	<ul style="list-style-type: none"> ▪ N/A. Data analysis is in progress



Change Control Process



SWBT Change Control Process

- Existing change control process is inadequate and is not adhered to by SWBT
- Versioning ordered by the TX PUC to be available 1/2000; end-to-end testing cannot be performed
 - SWBT representing 1Q2000 not January, 2000
 - SWBT is leading an OBF sub-committee and advocating for "flash cut"; not versioning
- Testing windows have been limited to 5 days (expanded to 14 days for the 8/99 release)
- Entrance and exit criteria does not exist
- SWBT refuses to support a go/no go process despite the request by the industry at large
- SWBT's 5/01 EDI Release clearly demonstrates the need for robust testing and a go/no go process
 - testing was performed 4/26-4/30
 - problems were referred to SWBT
 - Bad ECCKTs
 - Bad REFNUMs
 - Manual response transactions
 - On 4/30 AT&T and MCI requested that the 5/01 release be delayed until problems were fixed and retested
 - SWBT had already begun to load the release during the afternoon of 4/30 and refused to stop it
 - Officer level escalations resulted in assurances that the problems would be resolved by 5/03
 - Problems existed for more than 5 weeks after the release was implemented (6/07)
 - All problems involved fields that were not to have been impacted by the release
 - SWBT is now refusing to support regression testing which is the only way to validate that release modifications do not cause other items to "break"
- 12/19/98 Release process included incorrect requirements and late announcement of requirements